

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NICOLE JOHNSON-GELLINEAU,

Case No.: 16-CV-9945

Plaintiff,

-against-

NOTICE OF MOTION

STIENE & ASSOCIATES, P.C., CHRISTOPHER
VIRGA, ESQ., RONNI GINSBERG, ESQ., JP MORGAN
CHASE BANK NATIONAL ASSOCIATION, WELLS
FARGO BANK NATIONAL ASSOCIATION, AS
TRUSTEE FOR CARRINGTON MORTGAGE LOAN
TRUST, SERIES 2007-FRE1, ASSET-BACKED PASS-
THROUGH CERTIFICATES,

Defendants.

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MOTION BY:

L'ABBATE, BALKAN, COLAVITA
& CONTINI, L.L.P.
Attorneys for Defendants
*Stiene & Associates, P.C., Christopher
Virga, Esq. and Ronni Ginsberg, Esq.*
1001 Franklin Avenue, 3rd Floor
Garden City, NY 11530
(516) 294-8844

**DATE, TIME &
PLACE OF HEARING:**

At a date and time to be determined by the Court before
Honorable Kenneth M. Karas, at The United States District
Court, Southern District of New York, located at 300
Quarropas Street, White Plains, New York 10601.

SUPPORTING PAPERS:

- (1) Declaration of Matthew J. Bizzaro, dated September 28, 2018, together with all exhibits annexed thereto; and
- (2) Defendants' memorandum of law dated September 28, 2018.

RELIEF DEMANDED:

- (1) An Order pursuant to Rule 12 (c) of the Federal Rules of Civil Procedure, granting the defendants judgment on the pleadings, and dismissing the claims asserted against them by plaintiff, and

OTHER RELIEF:

- (2) Such other and further relief as this court deems just and proper.

DATED: Garden City, New York
September 28, 2018

Yours, etc.,

L'ABBATE, BALKAN, COLAVITA
& CONTINI, L.L.P.

By: 

Matthew J. Bizzaro, Esq.

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